

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SAUL SANTIAGO, X

Civil Action No.: 08cv3005(PAC-JCF)

Plaintiff,

-against-

JM HEAFORD LIMITED and
JM HEAFORD, INC.,SUBSTITUTION OF COUNSEL
FOR HEAFORD, INC.

Defendants.

STATE OF NORTH CAROLINA }
COUNTY OF _____ }
 } s.s.
 }

The undersigned hereby consent to the substitution of Cascone & Kluepfel, LLP, 1399 Franklin Avenue, Suite 302, Garden City, New York 11530, for Biedermann, Reif, Hoenig & Ruff, P.C., in the above-captioned action.

This substitution of counsel may be executed in counterparts and copies of signatures and/or facsimile signatures shall be considered original signatures.

Dated: March 27, 2008

CASCONNE & KLUEPFEL, LLP

Leonard Cascone
Leonard Cascone (6123)
Superseding Attorney
1339 Franklin Avenue
Garden City, New York 11530
(516) 747-1990

BIEDERMANN, REIF, HOENIG, & RUFF, P.C.

Peter H. Cooper
Peter H. Cooper (PHC4714)
Withdrawing Attorney
570 Lexington Avenue, 16th Floor
New York, NY 10022
(212) 697-6555

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

SAUL SANTIAGO, : Civil Action No.: 08cv3005(PAC-JCF)

Plaintiff, :
-against- :
JM HEAFORD LIMITED and :
JM HEAFORD, INC., :
Defendants. :
-----X

COUNTY OF NEW YORK }
} S.S.
STATE OF NEW YORK }

PETER H. COOPER, ESQ., an attorney duly admitted to practice before the courts of the State of New York and this Honorable Court, being duly sworn, deposes and says:

1. I am associated with the firm of Bidermann, Reif, Hoenig & Ruff, P.C., attorneys for defendants, and I am fully familiar with all of the pleadings and proceedings heretofore had herein.
2. I submit this Affidavit pursuant to Rule 1.4 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York in support of in support of defendant Heaford, Inc.'s substitution of counsel.
3. Heaford, Inc. and Heaford, Limited have separate insurers for this claim and the insurer for Heaford, Inc. has retained separate counsel on behalf of Heaford, Inc.
4. No discovery has been exchanged. As yet, Heaford, Inc.'s time to Answer the Complaint has not expired, and, upon information and belief, Heaford Limited has not been

served with the summons and complaint. Your affiant has been retained to appear on behalf of Heaford Limited, if service is effected.

WHEREFORE, it is respectfully requested that this Honorable Court "So Order" the Substitution of Counsel of Heaford, Inc. only, substituting Cascone and Kluepfel, LLP, for Biedermann, Reif, Hoenig & Ruff, P.C. as Heaford, Inc.'s counsel.

Dated: New York, New York
March 27, 2008



Peter H. Cooper (PHC 4714)

Sworn to before me this
30 day of March, 2008



ELAINE N. CHOU
NOTARY PUBLIC, State of New York
No. 02CH6047345
Qualified in New York County
Commission Expires August 28, 2010

Notary Public